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COUNSEL FOR SUPERIOR AIR PARTS, INC.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In Re:	§	
	§	Case No. 08-36705-bjh-11
SUPERIOR AIR PARTS, INC.,	§	Chapter 11
	§	
Debtor.	§	
	§	

MOTION FOR LEAVE TO PLACE EXHIBITS UNDER SEAL

COMES NOW Superior Air Parts, Inc. (“**Superior**”) and Dr. Bruno Kübler, as Insolvency Administrator of Thielert Aircraft Engines GmbH (“**Kübler**”), and ask the Court for leave to place certain exhibits introduced into evidence at the hearing on Superior’s Motion to Enforce [Dkt. 684] under seal pursuant to L.B.R. 9077-1(b).

1. Superior and Kübler ask the Court to place under seal certain aircraft part drawings introduced and to be introduced into evidence at the hearing on Superior’s Motion to Enforce [Dkt. 684], including exhibits “Superior 31” and “Superior 32.” Pursuant to L.B.R. 9077-1(c), Superior Exhibits 31 and 32 are being submitted to the Court for review via electronic mail.

2. The court may seal court records if the interests favoring nondisclosure in a particular case outweigh the public’s common-law right of access to judicial records. *In re*

Sealed Case, 237 F.3d 657, 666 (D.C. Cir. 2001); *SEC v. Van Waeyenberghe*, 990 F.2d 845, 848 (5th Cir. 1993); *see Nixon v. Warner Comm., Inc.*, 435 U.S. 589, 598, 98 S. Ct. 1306, 1312 (1978).

3. Here, although it is a matter of dispute between the parties, Superior contends the information contained in Exhibit 31 is proprietary and confidential to Superior. While the parties dispute who owns Exhibit 32 or the information on Exhibit 32, both parties contend that Exhibit 32 contains at least some information that is proprietary and confidential.

WHEREFORE, premises considered, Superior and Kübler respectfully request the Court place Superior Exhibits 31 and 32, as well as any further exhibits the parties may request to be placed under seal.

Respectfully submitted,

/s/ Christopher A. Robison

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**COUNSEL FOR DR. KUBLER, IN HIS CAPACITY AS INSOLVENCY
ADMINISTRATOR OF THIELERT AIRCRAFT ENGINES GMBH**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served via First Class U.S. Mail, postage prepaid, and/or via electronic mail, to counsel for Dr. Kubler on this, the 5th day, of August 2014.

/s/ Christopher A. Robison
Christopher A. Robison